

From: [Laura Parsons](#)
To: [Andrew Shelby](#)
Cc: [Angel Chiri](#); [Bill Jacobs](#); [Dan Peacock](#); [Edward Odenkirchen](#); [Jennifer Gaines](#); [John Hebert](#); [Kit Farwell](#); [Mary Powell](#); [Nicholas Mastrota](#); [Quentin Borges-Silva](#); [Russell Wasem](#); [Shannon Borges](#); [Tom Bailey](#); [William Erickson](#)
Subject: Re: PMRA inquiry on field and orchard use of rodenticides
Date: 10/15/2009 05:05 PM

(1) keep in mind that our mitigation says that "all outdoor above ground placements of **second generation anticoagulants** require bait stations" No second gen compound is registered for field use.

We did not intend that all outdoor above ground placements for field uses require bait stations. (I'm not against that provision, but that is not what we did in our mitigation decision of 2008.)

(2) Also, the use of blocks was strictly to protect young children. The prohibition of loose bait is only for products available for purchase by homeowner... Professionals can purchase loose bait even for use in residential markets. There is no across the board prohibition and particularly not for field uses....

▼ Andrew Shelby---10/15/2009 03:25:17 PM---Rodenticide Team, Tom Bailey has received a question from PMRA on rodenticide use in orchards and fi

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Date: 10/15/2009 03:25 PM
Subject: PMRA inquiry on field and orchard use of rodenticides

Rodenticide Team,

Tom Bailey has received a question from PMRA on rodenticide use in orchards and fields. We ask for any comments in response to these questions that you may have by COB Tuesday. Please refer to the following document provided by PMRA for context.

[attachment "Notes_Orchards and field uses_25Sept09.doc" deleted by Laura Parsons/DC/USEPA/US]

The risk mitigation decision referenced in the document and in these questions is linked here:

<http://www.epa.gov/opp00001/reregistration/rodenticides/finalriskdecision.htm#measures>

The questions:

First, would it be correct to assume that with new risk mitigation in place that 1) field/orchard uses would require bait blocks and 2) field/orchard uses would require bait stations?

Second, also based on new risk mitigation, do all above ground uses require bait stations?

Our preliminary answer:

Tom and I have the impression that bait stations are required. We do not find a requirement for bait blocks in the risk mitigation decision. We welcome your

interpretations on this.

Thank you for your input,

Andrew Shelby, Physical Scientist
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